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Attorneys for Plaintiff, MOE SALEM

10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 MOE SALEM,

13 Plaintiff,

14 v.

15 RIVERWALK HOLDINGS, LTD,
16 NELSON & KENNARD, a partnership
17 of Robert Scott Kennard and Donald G.
18 Nelson, ROBERT SCOTT KENNARD,
an individual, and DONALD G.
NELSON, an individual,

19 Defendants.

Case No: 13-CV-2484-BTM-RBB

**JOINT MOTION TO DISMISS
ACTION**

21 IT BEING HEREBY STIPULATED by and between the parties to this action
22 through their counsel of record that the above-captioned action be dismissed with
23 prejudice pursuant to FRCP41(a)(1) as a result of the settlement of this case, the
24 parties jointly move this court to dismiss this action and all claims asserted therein
25 with prejudice.

26 **RECORDON & RECORDON**

27
28 Dated: April 14, 2014

/s/Stephen G. Recordon
Attorney for Plaintiff, Moe Salem

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2 Dated: April 14, 2014

/s/ Clinton Rooney
Attorney for Plaintiff, Moe Salem

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5 **NELSON & KENNARD**

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7 Dated: April 14, 2014

/s/ Robert Scott Kennard
Attorney for Defendants

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10 **Signature Certification**

11 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative
12 Policies and Procedures Manual, I hereby certify that the content of this document is
13 acceptable to Robert Scott Kennard, counsel for Riverwalk Holdings, Ltd., Nelson &
14 Kennard, Robert Scott Kennard and Donald G. Nelson, and that I have obtained Mr.
15 Kennard's authorization to affix his electronic signature to this document.

16 **Recordon & Recordon**

17
18 Dated: April 14, 2014

/s/ Stephen G. Recordon
Attorney for Plaintiff